

Although VRS users can arguably have two video devices (e.g., a D-Link and Sorenson VP-100) to make VRS calls through all providers, it is burdensome and against the principles of functional equivalency for consumers to need two separate video devices. Hearing people are not expected to have two distinct appliances to make calls to or receive calls from their universe of telephone subscribers. Having separate devices requires consumers to keep separate lists of contacts, unique names and passwords for each of the systems. If VRS becomes portable, the lack of compatibility across VRS providers will impose an even greater burden, as VRS users are forced to choose which list of VRS contacts will be accessible to them from their hand-held devices.....Blocking calls is an anti-competitive practice that can lead to a VRS monopoly by one VRS provider. In the end, this will remove consumer choice in the selection of video relay service options. In order to encourage innovation and competition, all VRS equipment and services should be interoperable.....VRS providers are reimbursed by the National Exchange Carriers Administration's Interstate TRS Fund, a fund that receives its money through contributions made by all long distance telephone subscribers. No provider receiving money through this federally administered program should be permitted to engage in restrictive practices that block VRS calls.....The Americans with Disabilities Act requires relay services to be functionally equivalent to voice telephone services. Hearing people can pick up a telephone, get a dial tone, and call anyone from that phone, regardless of the telephone carrier that the caller or the called party uses. VRS users should also need only one device to make calls to anyone.....When Congress enacted the relay sections of the ADA, it stated that telecommunications carriers must "provide relay services on a nondiscriminatory basis to all users within their serving areas." Preventing customers from being able to easily access anyone, at anytime, and restricting incoming calls from certain users is discrimination under this Act.....The Americans with Disabilities Act requires relay services to be functionally equivalent to voice telephone services. Hearing people can pick up a telephone, get a dial tone, and call anyone from that phone, regardless of the telephone carrier that the caller or the called party uses..... VRS users should also need only one device to make calls to anyone. Hearing people are able to make telephone calls using simple seven to ten digit numbers. These numbers do not change when an individual changes telephone companies. While VRS users may similarly use "telephone numbers" for some video relay services, at present, one provider does not allow the numbers used on its system to access customers using other VRS systems. Providers should not be permitted to have exclusive dialing arrangements that make it more difficult for VRS users to make calls.